

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Tony Terrell Robinson,

Court File No. 17-CV-0437 (DSD/KMM)

Plaintiff,

v.

**DECLARATION OF NICOLE L.
BRAND IN SUPPORT OF MOTION
TO COMPEL**

Minnesota Department of Corrections, et
al.

Defendants.

I, Nicole L. Brand, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of Minnesota and I am a partner with Meagher & Geer, P.L.L.P., attorneys of record for defendant Stephen Dannewitz, M.D. I have personal knowledge of the matters testified to in this declaration.
2. I attach as Exhibit A a true and correct copy of 05/08/18 Correspondence from Nicole Brand to Tony Robinson;
3. I attach as Exhibit B a true and correct copy of 05/21/2018 Correspondence from Tony Robinson to Nicole Brand;
4. I attach as Exhibit C a true and correct copy of Dannewitz's Request for Production of Medical Records;
5. I attach as Exhibit D a true and correct copy of 08/02/2018 Correspondence from Robinson to Brand;
6. I attach as Exhibit E a true and correct copy of 08/14/2018 Correspondence from Brand to Robinson;

7. I attach as Exhibit F a true and correct copy of 08/24/2018 Correspondence from Robinson to Brand;

8. I attach as Exhibit G a true and correct copy of 09/06/2018 Correspondence from Brand to Robinson;

9. I attach as Exhibit H a true and correct copy of 09/20/2018 Correspondence from Robinson to Brand;

10. I attach as Exhibit I a true and correct copy of 10/29/2018 Correspondence from Robinson to Brand;

11. I attach as Exhibit J a true and correct copy of Meet-and-Confer Statement.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: November 26, 2018

s/ Nicole L. Brand

Nicole L. Brand

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